



# Lear's Code of Business Conduct & Ethics



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# Lear's Code of Business Conduct & Ethics

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# A Message from Our Leaders

**Getting Results the Right Way** is one of our core values. It means showing respect, making sound decisions, and always acting with integrity—whether working with our teammates, customers, suppliers, investors, or communities.

Our Code of Business Conduct & Ethics helps us make better decisions. We have updated our Code to make it easier to understand and apply to our everyday work experiences. Every section of the Code is organized the same way:

- A clear and simple statement of how we Get Results the Right Way
- Real-world situations taken from employee experiences, showing correct and incorrect responses

While the Code covers many topics, it does not cover every situation. For more information, follow the links in the guideposts. If you need advice, please talk to your manager, the Legal Department, Human Resources, or Ethics & Compliance.

Please join us in making a commitment to uphold our Code. Get to know it. Act with integrity and demonstrate ethical conduct in everything you do. If you have a question or concern, please speak up!

*Thank you for all you do to make better decisions and Get Results the Right Way every day.*

Sincerely,



**Ray Scott**  
President and  
Chief Executive Officer



**Chris Mazzoli**  
Chief Compliance Officer



# What Drives Us

## OUR HISTORY



100+ year heritage as a leading automotive supplier



184,000 employees in 38 countries



Largest U.S. headquartered supplier of automotive parts in the world



Design, engineer, and manufacture world-class products for every major automaker

## OUR VISION

Our talented team creates products that ensure the comfort, well-being, convenience, and safety of consumers. Working together, we are

**Making every drive better™**

## OUR VALUES

Our reputation is built upon how we treat each other and everyone we work with.

### Be Inclusive.

We are committed to each other, our suppliers, and our customers as well as protecting the environment and supporting the communities where we live and work. We treat everyone with dignity and respect.

### Be Inventive.

From developing innovative, intelligent vehicle experiences to delivering operational excellence, we are always driving forward.

### Get Results the Right Way.

We work as a team, understand our customers' needs, show respect, empower others, make sound and timely decisions, invest in our talent for the future, and focus on long-term goals instead of short-term gains.



# Act with Integrity

Our Code is the ethical foundation of our company. It helps us conduct business legally, fairly, and honestly by setting expectations and providing guidance to help us **make better choices** every day. Putting our values into action promotes a culture of trust and respect—with our teammates and the many people we work with outside our company.

## HOW CAN I MAKE A DIFFERENCE?

No matter what your role is at Lear, you have an opportunity to support our company's ethical culture and support Lear's values.

### *Here's how we Get Results the Right Way:*

- **Understand and comply with our Code**, company policies, and applicable laws
- **Complete all Ethics & Compliance training courses**
- **Speak up** if you see or suspect a violation of the Code, company policies, and applicable laws
- **Cooperate in Ethics & Compliance investigations**
- **Ask questions** when you need advice, are uncertain about how to act or see something that makes you uncomfortable
- **If you have ideas to enhance our ethical culture, share them with Ethics & Compliance**

### *If you are a manager,*

- **Lead by example** and demonstrate Lear's vision and values through your own actions
- **Talk to your team members about ethical issues** and encourage them to come forward with questions and concerns
- **Address concerns** brought to your attention and notify Ethics & Compliance of all actual or suspected Code or policy violations
- **Do not retaliate** against any person who reports a concern or participates in an investigation



## SPEAKING UP

We all must do our part to uphold our Code and protect Lear. If you ever see or suspect something improper, speak up. Ethics & Compliance is here to help. *Together, we can find the right solution.*

### When to Speak Up

- ✓ If you're not sure what the Code requires in a particular situation
- ✓ If you see or suspect a violation of:



**Our Code**



**Our Policies or Procedures**



**Any Law or Regulation**

- ✓ If you feel pressured to do something you think might violate the Code, our policies or procedures, or any law or regulation

### How to Speak Up



Talk to your manager or Human Resources



Report online at [everyone.lear.com](http://everyone.lear.com) or [reportlineweb.com/Lear](http://reportlineweb.com/Lear)



Report by phone at the numbers posted on the [Ethics & Compliance intranet page](#)



Report with the mobile phone app by scanning the QR code below or on posters in your facility



Email Ethics & Compliance at [compliance@lear.com](mailto:compliance@lear.com)



By mail to Lear's Chief Compliance Officer at 21557 Telegraph Rd., Southfield, MI 48033



Scan this QR code with your smartphone to access Lear's mobile-friendly webform.

Reports online or by phone can be made in your local language and anonymously, unless prohibited by local law.

### What is Ethics & Compliance?

Our Ethics & Compliance department helps Lear and its employees maintain the highest standards of integrity through leadership commitment, training, guidance, and ongoing communications. We report our progress in Lear's annual [Sustainability Report](#).



## WHAT HAPPENS WHEN I SPEAK UP?

Calls and reports to the Helpline are handled by an outside company. In most countries, you have the option to remain anonymous. In countries where the law does not allow it, the Helpline representative will let you know. If you use these resources to speak up, you will receive a report number so you can check the status of your report or provide additional information. All issues reported through the Helpline will be forwarded to the Ethics & Compliance team, and your inquiries will be addressed promptly.

We take all reports seriously. Once a report is received, we investigate as discretely as possible and determine whether our Code, policies, or applicable laws have been violated. Our Code requires all Lear employees to cooperate with investigations.

Investigations are designed to understand and report the facts. Each investigation involves unique facts and circumstances. Some are complex and need more time to resolve. Others are urgent and require immediate attention.

### Ethics & Compliance Helpline

We call it a Helpline because Ethics & Compliance is here to answer questions about our Code and policies.

## NO RETALIATION

The Anti-Retaliation Policy protects people who speak up and cooperate during investigations. If you believe you or a co-worker is experiencing retaliation, notify Ethics & Compliance immediately. You may also use any of our [reporting channels](#).

## WAIVERS OF THE CODE

A waiver of compliance with our Code for executive officers or directors of Lear may be made only by Lear's Board of Directors or a Board committee acting on behalf of the Board and will be promptly disclosed to the extent required by law and the listing requirements of the New York Stock Exchange. A waiver of our Code for all other employees may be made only by Lear's Legal Department.





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# Protecting Lear & Putting Lear First

# Information Technology Compliance & Security



We protect and use our information technology resources to work efficiently.

## HOW WE GET RESULTS THE RIGHT WAY

In today's world, we rely on information technology tools every day. Computers, mobile phones, email, servers, and networks help us communicate quickly, gather data, improve productivity, and better serve our customers. Improper use can harm our reputation and jeopardize our security. To protect the company's property or detect potential criminal conduct, communications and activities on Lear-owned systems, equipment, and devices may be monitored to the extent allowed by law.

*We protect our information technology resources by:*

### Device Security



- Securing computing devices to prevent theft or loss of the equipment and the sensitive information contained within them
- Locking displays or logging out when leaving a device unattended
- Taking your information security training so you can identify phishing and other scams used by cybercriminals

### Email and Data Transfer



- Never bypassing or disabling information security measures
- Using Lear-provided internet access and email ethically, legally, and in accordance with Lear policies
- Never using public internet email services such as Gmail, Yahoo, etc. for Lear communications
- Storing critical, important, or sensitive data files using Corporate IT-approved services

### User Credentials



- Never sharing passwords and keeping all user passwords confidential
- Changing passwords immediately if compromised or as directed by a security administrator

### Software Management



- Complying with copyright and software licensing laws
- Never installing unapproved or personally owned software on company-owned devices (see the [Global Software List](#))
- Restarting your computer at least once a month or when directed by Corporate IT to ensure software updates are installed, including security patches



## OUR CODE IN ACTION



### The Right Way

You receive an email from a supplier asking you to remit payment to a new bank account. Everything looks legitimate, but just to be sure, you call the supplier personally.

*Good call. Follow Lear's **Security Banking Policy** and procedures. Cybercriminals often use this ploy to steal money from companies like Lear. If you learn that the email was not from your supplier, contact the **Global Service Desk** immediately.*



### Which Way?

You download sensitive company information to a thumb drive before a business trip to ensure you have the documents available to you. Good idea?

*Probably not. Thumb drives are easily lost and can be compromised. There are better and more secure ways to transfer sensitive company data. If you need to store sensitive company data and have it available to you remotely, use a Corporate IT-approved service or device.*



### The Wrong Way

You need access to a file located on a restricted drive to answer an urgent question for a customer but aren't in the office. You call a co-worker who does not have access to the restricted drive and give them your password so they can access the information and send it to you. If you give permission to use your password and you are only doing it once, it's okay. Right?

*No. Passwords must never be shared under any circumstances. All employees are accountable for any action taken with their credentials. Instead, find someone else who is authorized to access the restricted drive and ask them to get the information for you using their password.*

Review Lear's **Information Security Policy** and **Statement on Confidential Information**.



Report questionable computer behavior or the loss of company devices to the **Global Service Desk**.



# Conflicts of Interest



We make objective decisions, putting Lear ahead of our personal interests.

## HOW WE GET RESULTS THE RIGHT WAY

Everyone has interests outside of work. When our personal interests conflict with what's best for the company, it can be hard to make the right choices. Social or family relationships, financial investments, or activities outside of work may impact our ability to make impartial business decisions. We disclose all potential conflicts to Ethics & Compliance through the **E&C Disclosure Management System** so they can be addressed and managed properly.

### *We avoid conflicts of interest by:*

- Never using company assets, property, information or our position for personal benefit or the benefit of our family or friends
- Using the **E&C Disclosure Management System** to promptly report:
  - Employment or work outside of Lear, including membership on private, public, or non-profit boards
  - If **immediate family members** have an ownership interest in a competitor, supplier, or customer
  - When any **family member** works at Lear, or works at a competitor, supplier, or customer

### What is the difference between an immediate family member and a family member?

- Immediate family members are limited to your spouse (even if not living with you), members of your household, parents and stepparents, children and stepchildren, siblings, mothers- and fathers-in-law, and brothers- and sisters-in-law.
- Family members include immediate family members, plus other people you are related to—whether directly or by marriage. These include grandchildren, aunts, uncles, cousins, nieces, and nephews as well as people with whom you have a romantic relationship.





## OUR CODE IN ACTION



### The Right Way

Your spouse works in the sales department of one of Lear's suppliers. To avoid issues with a conflict of interest, you disclose it to your supervisor.

*Good move, especially if you are in a position that would influence business between Lear and the supplier. In addition to letting your supervisor know, you must also report it through the E&C Disclosure Management System. By disclosing this relationship, you avoid even the appearance of a conflict of interest.*



### Which Way?

You find out that your homebuilder is also a Lear supplier. You don't believe that you received any special pricing or discounts. What should you do?

*Using a company vendor to perform personal business, even if you were not originally aware of the relationship, could be a conflict of interest or create the appearance of a conflict of interest. You must promptly disclose this situation through the E&C Disclosure Management System. Ethics & Compliance will advise you how to proceed.*



### The Wrong Way

Your nephew is looking for a job, and you have a good relationship with a supplier that may want to hire him. It's an entry-level position. Since he wouldn't work on Lear's account, you don't see any conflict.

*Wrong. If you are using your position to influence a supplier or the hiring process, it's a conflict of interest. Contact Ethics & Compliance or your local Legal Department for advice.*



Disclose relationships that may be a conflict of interest using the **E&C Disclosure Management System.**

# Confidential or Proprietary Information



We protect and properly use Lear's, our customers', and our suppliers' confidential and proprietary information.

## HOW WE GET RESULTS THE RIGHT WAY

From our technical centers to the plant floor, everyone at Lear uses confidential or proprietary information to help our company succeed. Our customers and suppliers trust us with their confidential and proprietary information, too.

Unauthorized use or disclosure of Lear's, our customers' or our suppliers' information could damage our competitive advantage, may violate our obligations to our customers and suppliers, and may even expose Lear to legal liability. In addition, unauthorized use or disclosure of confidential and proprietary information could result in discipline, including termination and legal action.

### *We protect confidential and proprietary information by:*

- Obtaining a **Confidentiality or Non-Disclosure Agreement** before discussing Lear's confidential or proprietary information with a customer or supplier or any other outside party
- Disclosing confidential or proprietary information only when it is allowed under a confidentiality agreement, and even then, only when necessary to conduct business
- Ensuring confidential documents are not visible to others, whether on paper or electronic devices
- Never discussing confidential or proprietary information in public
- Protecting all confidential or proprietary information, even if you no longer work for Lear
- Asking the Legal Department for guidance if we are unsure about whether information is confidential or proprietary
- Returning all records containing confidential or proprietary information to Lear
- Immediately notifying the Legal Department of any actual or suspected misuse, misappropriation, or unauthorized disclosure of confidential or proprietary information that comes to your attention

## What is Confidential or Proprietary Information?

Could a non-Lear person find this information on the internet? If not, consider it confidential or proprietary. Confidential or proprietary information includes all non-public information, such as:

- Business plans and corporate strategies
- Sales and marketing plans
- Cost and pricing information and analysis
- Organizational charts
- Compensation and benefit information, including labor rates
- **Personally identifiable information** about other employees
- Engineering and manufacturing practices, ideas, designs, trade secrets, documents, drawings, data, prototypes, and scrap products
- Unpublished financial results, data, forecasts, and reports
- Potential corporate transactions, acquisitions, divestitures, and investments
- Contracts and terms with suppliers and customers





## OUR CODE IN ACTION



### The Right Way

You receive an email from a co-worker with engineering drawings attached and notice a non-Lear email address in the "cc" line. After asking your co-worker about the address, she tells you not to worry because the email address is for her newly formed consulting business. You are concerned that your co-worker may be misusing company information and decide to talk to your manager.

*Good move. Proprietary and confidential information should not be sent to personal email addresses and should never be used for personal benefit or for any reason unrelated to your work at Lear. When proprietary and confidential information leaves Lear, it loses the protections provided by Lear's IT security processes and systems, and risks being exposed, lost, misused, or accessed by non-Lear personnel.*



### Which Way?

A manager asks you to place confidential or proprietary files that he cannot access onto a shared drive. Later, you learn the manager is resigning from the company. Should you tell anyone?

*Yes. You should immediately contact the Legal Department. The manager may have made the request to steal confidential records.*



### The Wrong Way

You accidentally send a price quote to the wrong person. You immediately notify the person and request that the email be deleted (including in the trash folder) before it is read. You also inform the customer of the mistake. You've done everything you can. Right?

*Wrong. Check with your manager to see if anything else needs to be done to correct the error. You should also make sure that you double check the recipient field on emails going forward to avoid the same issue in the future.*

# Protecting & Properly Using Company Property



We take care of company property like it's our own.

## HOW WE GET RESULTS THE RIGHT WAY

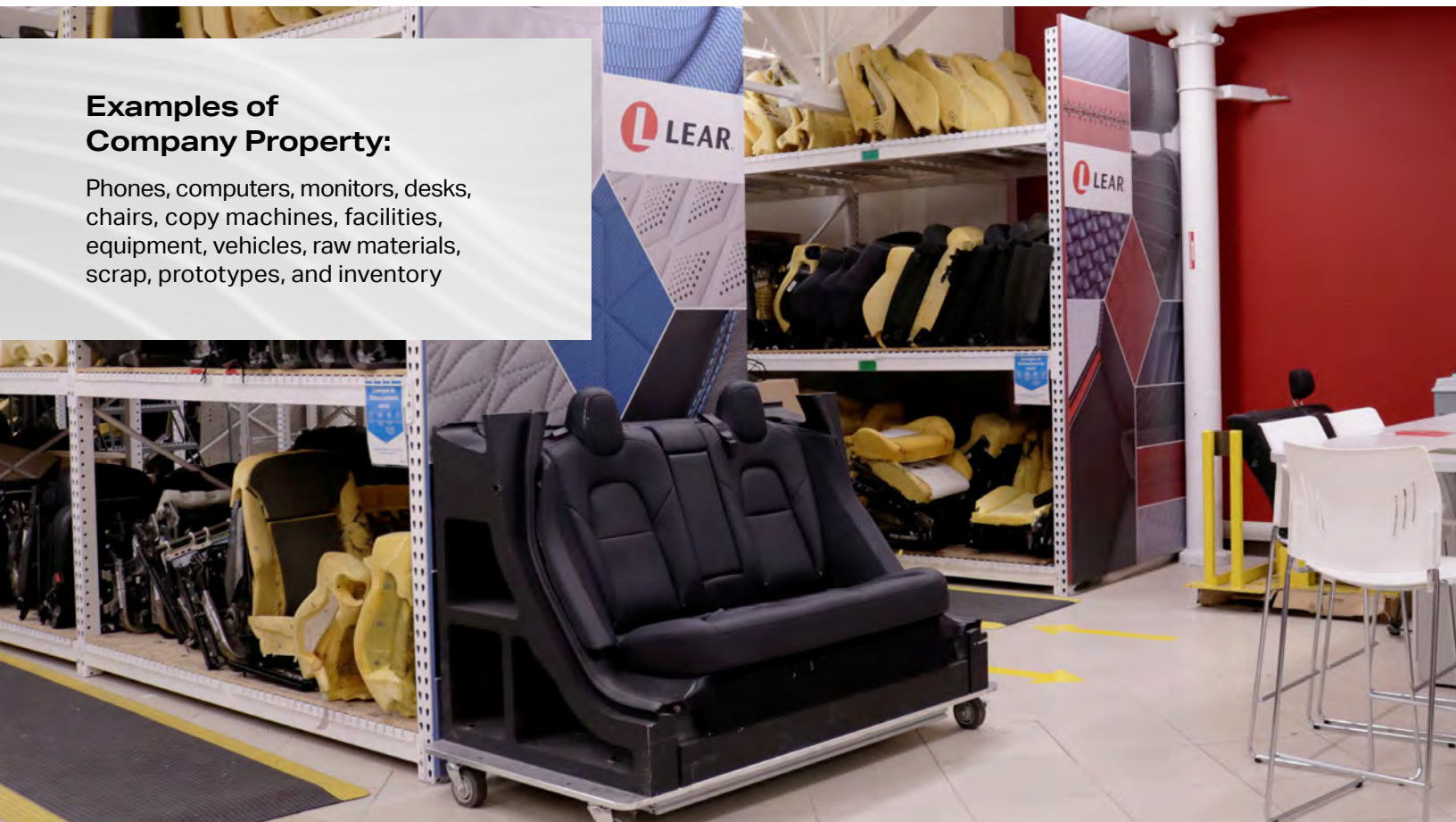
From forklifts to computers, we all use company property to do our jobs. It's our responsibility to use it wisely and take good care of it. That means protecting our property from improper use or theft.

### *We protect company property by:*

- Using company property only for legitimate business purposes (although reasonable personal use of computers and phones is permitted)
- Preventing damage, abuse, waste, theft, or loss
- Never using company computers or phones to access or distribute inappropriate or illegal materials, such as pornography
- Returning all company property (and providing necessary passwords) when pursuing other career opportunities
- Reporting any suspected fraud, theft, improper disclosure, waste, or misuse of the company's property

### **Examples of Company Property:**

Phones, computers, monitors, desks, chairs, copy machines, facilities, equipment, vehicles, raw materials, scrap, prototypes, and inventory





## OUR CODE IN ACTION



### The Right Way

You are heading to a customer location for a meeting and decide to stop for coffee on the way. Instead of leaving your laptop in the front seat of your car, you decide to take it with you into the café. Even though you'll only be gone a few minutes, you'd hate for anyone to steal it.

*Good move. We should all be careful about protecting company property and not take chances.*



### Which Way?

You are working late and need to let your spouse know. Is it OK to use your company phone or computer to send a message?

*Yes. Generally, Lear-owned devices should be used for Lear business only. However, reasonable personal use is permitted. This would include quick personal messages.*



### The Wrong Way

You notice some scrap product in a dumpster. You think you may be able to use it at home. Since it's in the trash, you figure no one will care if you take it.

*If you see products in the dumpster that are usable, then the product has not been scrapped properly. You should tell the plant manager. This material is likely confidential or proprietary and should be taken into the plant to be scrapped according to our procedures. In general, material in the trash is not available for reuse.*



Review our  
**Information**  
**Security**  
**Management**  
**System Policy.**

# External Corporate Communications



We use accurate and consistent messages when we tell Lear's story to the public.

## HOW WE GET RESULTS THE RIGHT WAY

Our Corporate Communications team ensures that all communications with the media, investors, and the public are accurate and consistent.

*We support our Corporate Communications team by:*

- Forwarding any media, investor, or other requests from outside the company to Corporate Communications along with the person's contact information
- Submitting a **Conference Speaker Request Form** to Corporate Communications when invited to speak at a conference or other engagement
- Forwarding any requests from a supplier or other organization to use the Lear logo to Corporate Communications

### What are External Corporate Communications?

External corporate communications refer to the ways Lear shares its story with external audiences, such as:

- Investors
- Media outlets
- General public
- Government agencies and other third-party regulators

Corporate communications can take many forms, depending on the audience being addressed.





Review our  
**External  
Communications  
Policy.**

If you have questions,  
contact Corporate  
Communications at  
[communications@lear.com](mailto:communications@lear.com)

## OUR CODE IN ACTION



### The Right Way

A news reporter calls you and begins asking questions about the company. You politely interrupt, ask for the reporter's contact information, and tell them that Corporate Communications will get back to them.

*Great! Corporate Communications will contact the reporter and find out more about the inquiry.*



### Which Way?

You are asked to make a presentation at a conference.  
Do you need permission?

*Yes. Before agreeing to speak at a conference or event, complete the **Conference Speaker Request Form**. The form explains the approval process.*



### The Wrong Way

Your facility is planning to sponsor a local community event and would like to use the Lear logo in the promotional materials. Because the company already confirmed its sponsorship, you don't need to get permission to use the Lear logo. Right?

*Wrong. You should inform Corporate Communications of the request. There are many considerations regarding the correct use of a Lear logo, including perceived endorsement or a special relationship that may or may not represent an official Lear position. Other questions may include how and over what period the logo is used. That's why Corporate Communications reviews every request to use our logo.*



# Working Together at Lear

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# Expect Respect



We expect all employees to treat each other with respect.

## HOW WE GET RESULTS THE RIGHT WAY

We believe the best way to deliver the highest quality products and services is to maintain a work environment that fosters collaboration, inclusiveness, open-mindedness, and respect. We do not tolerate harassment, discrimination, workplace violence, or physically, mentally, or emotionally abusive disciplinary or management practices.

*We maintain a respectful culture by:*

- Valuing everyone on our teams
- Listening to each other
- Being aware of our words and actions
- Speaking up for others when we witness harassment or bullying
- Reporting all harassment, discrimination, bullying, and retaliation to Human Resources or through the [Helpline](#)



## OUR CODE IN ACTION



### The Right Way

During a team meeting, a co-worker tells a joke that makes you feel uncomfortable. Afterwards, you talk to the person privately and explain why the joke was offensive. Right move?

*Absolutely! It's possible the person didn't realize the comment was offensive. Many incidents can be resolved if addressed promptly and in a respectful manner. Conversely, if you are given feedback, receive it in a spirit of cooperation.*



### Which Way?

You notice that a male member of the team consistently speaks over female team members. You are concerned that the repeated interruptions may discourage female team members from actively participating on the team. Should you say something to the male team member?

*Yes, especially if you think that the male team member may not realize that he is interrupting female team members. By speaking up for your teammates, you help build a more inclusive and respectful environment. If you don't feel comfortable with speaking up or if the matter isn't resolved, you should raise the concern to Human Resources.*



### The Wrong Way

A group of co-workers constantly belittles you in front of your teammates. Because they have seniority, you feel uncomfortable talking to them about it. You don't want to cause any problems. Should you just continue to ignore it?

*No. This kind of behavior does not reflect our values. You should either talk with your supervisor or report it to Human Resources.*



Our **Harassment-Free Workplace Policy** and **Workplace Violence and Weapons Policy** applies to all employees, visitors, customers, suppliers and other non-employees such as people assigned to work at Lear.

You can contact HR at [hrconcerns@lear.com](mailto:hrconcerns@lear.com)



# Diversity, Equity & Inclusion



Together We Belong

## HOW WE GET RESULTS THE RIGHT WAY

We hire and promote the best of the best. Every employee is offered equal opportunities for success, regardless of race, disability, gender, sexual orientation, gender identity or expression, past or present military service, religion, age, national origin, political and social views, or any other status protected by law.

*We support diversity, equity, and inclusion by:*

- Hiring, promoting, training, and paying employees based on qualifications, performance, skills, and experience
- Including diverse perspectives at all levels in decision-making
- Treating everyone equitably
- Never discriminating against individuals or groups
- Working with minority-, women-, LGBT+, and veteran-owned suppliers





Learn more in our  
**Equal Employment  
Opportunity Policy.**

## OUR CODE IN ACTION



### *The Right Way*

A person always eats alone at lunch time. Instead of assuming that they want to eat alone, you ask them if they would like company.

*Right call. Make a connection and help a co-worker feel welcome at our company.*



### *Which Way?*

You are organizing a customer entertainment event and are thinking about taking them golf. Only a few of your team members play golf. Is it okay if some of your team members won't be able to participate?

*Maybe. Organizing inclusive events where all customer representatives and Lear team members can participate is the best practice. However, if there are multiple opportunities over the course of a year where customer representatives and Lear team members can interact, then a golf outing might be okay.*



### *The Wrong Way*

Whenever you have a project that requires extensive travel, you assign it to a team member without children. Is this okay?

*No. It's not okay to treat team members differently based on their family situations. You should assign projects based on employee qualifications, experience, skills, and other work-related factors.*



# Environmental, Health & Safety



We protect the environment and each other.

## HOW WE GET RESULTS THE RIGHT WAY

Each of us is responsible for maintaining a safe and healthy workplace. We comply with environmental legal requirements and support environmental programs in communities where we do business. Violence or threatening behavior is not permitted under any circumstances.

### *We protect the environment and each other by:*

- Conserving natural resources by decreasing carbon, increasing energy efficiency, reducing water use, improving air quality, recycling, reducing waste, controlling hazardous materials, protecting biodiversity, and training employees and suppliers
- Following health and safety rules and practices, and immediately reporting accidents, injuries and unsafe equipment, practices, or conditions
- Never participating in violent, threatening behavior or bringing weapons on company property
- Coming to work free from the influence of drugs or alcohol



## OUR CODE IN ACTION



### The Right Way

You notice a co-worker shortcutting a safety procedure to save time. You tell him that his family would like to see him come home safely from work tonight and remind him about the correct safety procedure.

*Thank you! Your actions could have helped avoid an injury. Working safely—and ensuring your teammates do—is always the best approach, even if it takes longer.*



### Which Way?

You've been prescribed medication that contains a warning that the medication may impair your ability to operate machinery or drive. Should you disclose this to Human Resources?

*Absolutely! Your HR representative will work with you and your doctor to see if there is a way to accommodate taking the medication and still work safely.*



### The Wrong Way

You hurt your hand on a piece of machinery while working. Rather than report the accident, you keep it to yourself because you don't want to end the plant's streak of no lost time (zero injuries).

*That isn't how we work at Lear. If you are injured, report the injury to your facility's EHS team. Your health and safety come first. We track safety so we can prevent issues. Reporting this now could prevent future injuries.*

Our **EHS Policy** focuses on preventing pollution, providing a safe work environment, protecting natural resources and complying with government regulations.





# Human Rights & Fair Labor Practices



We treat everyone with fairness and dignity.

## HOW WE GET RESULTS THE RIGHT WAY

As champions of human rights and fair labor practices, we respect the rights of people throughout our operations, the communities where we operate, and our global supply chain. We provide a safe and healthy work environment, pay our employees fairly, and comply with all laws that ensure equal pay, minimum wage, overtime pay, freedom of association, and the right to engage in collective bargaining.

***We treat everyone with fairness and dignity by:***

- Never using forced or child labor or corrupt labor practices
- Providing fair pay, hours, benefits, and working conditions
- Requiring our suppliers to follow workplace practices consistent with our own





Learn more in our  
**Global Labor  
Standards.**



If you have a concern,  
contact Human  
Resources at  
[hrconcerns@lear.com](mailto:hrconcerns@lear.com)

## OUR CODE IN ACTION



### *The Right Way*

During a plant tour at a supplier's facility, you notice that most of the workers seem very young. You suspect the supplier is using child labor and report it.

*Good call. Lear never uses child or forced labor, nor do we do business with companies that use child or forced labor.*



### *Which Way?*

*You heard a rumor about one of the company's suppliers not paying overtime to their employees. Since this doesn't involve Lear employees, should you raise this concern to your manager?*

*Yes. Lear expects its suppliers to comply with all wage and hour laws and to conduct business ethically. We should always be alert to signs of unlawful practices and report them to management or Ethics & Compliance.*



### *The Wrong Way*

To avoid going over budget, your manager instructs you to clock out but continue working after your shift ends. You want to be a team player, so you do it. Good idea?

*No. Lear pays employees for all hours worked. If you are asked to work off-the-clock, contact Human Resources immediately.*



# Personally Identifiable Information



We respect privacy and protect personal information.

## HOW WE GET RESULTS THE RIGHT WAY

To run our business, we create records that include personally identifiable information (PII) every day. Each one of these records represents a person who trusts us to protect their privacy. Unintended disclosure can lead to stolen identities, fraud, and severe consequences for our company.

### *We protect PII by:*

- Using and keeping PII for legitimate business purposes only (in some places, legal justification is required)
- Securing PII from unauthorized access, use, or disclosure
- Never sharing PII with anyone who does not have a business “need to know”
- Only collecting, using, and storing as much PII as is strictly necessary for the purpose for which it was collected
- Contacting the Legal Department immediately about any unauthorized access or disclosure



## What is Personally Identifiable Information?

Personally identifiable information (PII) is any information that identifies or can be used to identify an individual, including:

- Name
- Email address
- Home address
- Phone number
- Health information
- Employee ID
- Location
- Birth date
- Social Security number

## OUR CODE IN ACTION



### *The Right Way*

A sales rep heard that one of your teammates had a baby and wants to send flowers. She asks for the teammate's address. Since that information is personal, you suggest that she send a card to the business location instead.

*Good thinking. You shouldn't share a home address or any other PII without the person's permission.*



### *Which Way?*

You accidentally forward a spreadsheet containing salary information to more recipients than intended. You attempt to recall the email and contact IT to see if they can help. Good decision?

*Accidents happen. It is important to act immediately, but do not try to fix it yourself. In cases like this, report it immediately to the Legal Department or Ethics & Compliance. They can help determine the right actions to take to comply with local privacy laws and make sure Lear is protected.*



### *The Wrong Way*

To build team spirit, you run a report through the HR system and send a list of birthdays to everyone in your department.

*Nice thought, but it isn't legal. Birth dates are PII. Find a different way to celebrate with your teammates.*







# Acting with Integrity

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# Anti-Corruption: Government & Commercial Exchanges



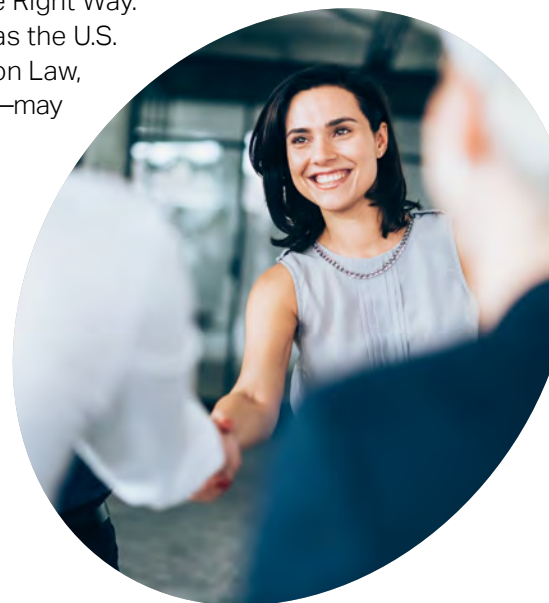
We win, retain, and expand our business based solely on merit.

## HOW WE GET RESULTS THE RIGHT WAY

Bribes are unethical, illegal, and go against Lear's core value of Getting Results the Right Way. Even the appearance of a bribe can harm Lear's reputation. Violating laws—such as the U.S. Foreign Corrupt Practices Act (FCPA), U.K. Bribery Act, PRC Anti-Unfair Competition Law, Brazilian Clean Companies Act, anti-money laundering and other anti-corruption laws—may result in criminal penalties or fines for you and Lear.

### *We conduct business ethically by:*

- Never paying or receiving bribes, kickbacks, or facilitation payments (otherwise referred to as “grease” or “speed” or “baksheesh” payments) to or from any person or entity—and never soliciting gifts
- Never making a political contribution in Lear's name
- Keeping accurate records and labeling all expenses in detail
- When required, seeking written pre-approval from Ethics & Compliance using the **E&C Disclosure Management System**
- Complying with all anti-bribery and anti-corruption laws in every country where we do business



While gifts or entertainment that are supported by a proper business purpose are usually fine, lavish or inappropriate gifts and entertainment may be perceived as influencing others. Some gifts may even be illegal or violate our customers' policies. To avoid creating a conflict of interest or the appearance of a bribe, seek pre-approval when necessary, and **always** ensure that gifts, meals, and entertainment (GME) follow these **general principles**:

- Related to a proper business purpose
- Not designed or perceived to influence a business decision
- Reasonable in amount and frequency
- No cash or cash equivalents



## What Could Be Considered a Bribe?

Bribes come in many forms. If the general principles are not followed, there is a risk that anything of value can be perceived to influence a business decision.

*Examples include:*

- Dinner
- Travel
- Gift cards
- Gifts
- Job offers
- Loans
- Tickets
- Discounts
- Donations to charity



## What is Money Laundering?

Criminals try to hide illegal activities by moving funds through legal businesses. If something is bought with stolen money, it is criminal property.

*Watch out for:*

- Irregular money transfers, cash payments or paying in a different currency than noted on the invoice
- Requests to ship to a different country than where the payment originated
- Requests to ship to a different company or third party than the party you are dealing with
- Poor record keeping, multiple tax IDs, unverified documents, or a reluctance to provide information



## Quick Reference for GME Approval Thresholds

### Giving/Receiving from Third Parties

*(Other than Government Officials or Union Representatives)*

#### ≤ \$75 USD per person

Conform with general principles

#### > \$75 USD per person

Written pre-approval from E&C required

### Giving/Receiving from Government Officials or Union Representatives

#### ≤ \$25 USD per person

Conform with general principles and log any gifts

#### > \$25 USD per person

Strongly discouraged, written pre-approval from E&C required

*NOTE: Pre-approval is not required for any company-provided gift bearing the Lear logo.*



Read more in our  
**Anti-Bribery and  
Anti-Corruption Policy;  
Global Gifts, Meals and  
Entertainment Policy;**  
and **Global Government  
Meetings Policy.**

OUR CODE IN ACTION



The Right Way

You and a colleague meet a local government official who opposes the company's plan to expand the manufacturing plant. You talk for the entire afternoon but still have topics to cover. You want to continue the conversation over dinner. Because you invited him to dinner and you have a meal per diem, you pay. That's okay, right?

Yes, if the meal is under \$25 per person. If you think the meal will be over \$25 per person, then you must seek pre-approval via the **E&C Disclosure Management System**. If there isn't time to get pre-approval, you must log the meal with an explanation within 2 business days via the **E&C Disclosure Management System**. If this is an extension of the meetings, you must include a member of Finance, Ethics & Compliance, or the Legal Department. There are special rules for government officials, and you should be cautious when entertaining them or providing gifts or meals. Even if GME is under \$25, it may appear to be an inducement. A bribe can be anything of value, even an inexpensive meal. The benefit provided to a government official may also be a violation of local law.



Which Way?

You have a customer coming to visit your location for the first time. You've never met them in person and would like to take them to dinner to build the relationship. When you make the invitation, you find out that their spouse is traveling with them. Is it okay to invite their spouse to dinner? What about your own partner?

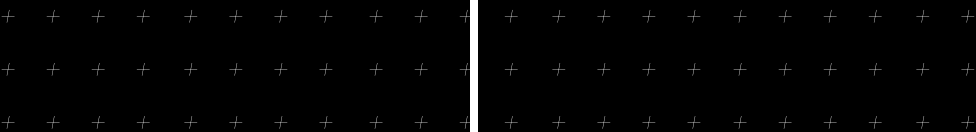
It depends. If your manager approves the entertainment of both the customer and their spouse and the event otherwise complies with the general principles of our GME policy (e.g., is not extravagant and is related to a valid business purpose), then it is likely permissible. Be sure to seek the necessary pre-approvals required under the GME policy. When in doubt, contact Ethics & Compliance.



The Wrong Way

A supplier wants to receive payment in a different country and currency from where their business is located. He says it makes receiving payments more convenient. He also explains that if you refuse, it could delay receipt of critical parts. To avoid the delay, you agree.

Wrong. Being asked to provide payment in a different country or currency from the country or currency where a supplier, vendor, or customer conducts business is a red flag and may be an attempt to launder money. You should always follow Lear's internal processes for changing vendor payment terms to ensure changes are appropriate and legal.





# Accurate Business & Financial Records



We maintain financial records that accurately reflect our business.

## HOW WE GET RESULTS THE RIGHT WAY

Accurate business and financial records help us make smart decisions, comply with the law, and meet our business, financial, and legal obligations. Whether you are recording your time, claiming an expense, or managing inventory, we always make sure the information truly reflects the facts.

*We maintain accurate financial records by:*

- Never manipulating or re-creating records or signing a name other than your own
- Always dating documents on the date that you sign them
- Maintaining timely, complete, and accurate business records, including personnel records and actions, shipping documents, inventory counts, and customer and supplier agreements
- Never providing false, inaccurate, exaggerated, fabricated, or misleading information
- Retaining or destroying records according to the company's **Record Management Program** unless otherwise directed by the Legal Department



## OUR CODE IN ACTION



### The Right Way

Your plant's inventory levels are high, and you notice that new inventory is not being recorded when it arrives. You tell the plant manager.

*Good idea. We must record inventory when it is received. Failure to record inventory when it arrives is the same as falsifying records and could have serious consequences for the company and you.*



### Which Way?

You've been asked to provide records of shipments to a customer but cannot find the original documents. It is easy to re-create the documents. Should you?

*If you can't find the original documents, tell your manager. There are other ways to handle lost records. You should never attempt to solve the issue by re-creating, backdating, or signing or initializing someone else's name to a document. Re-creating documents is the same as falsifying records and could have serious consequences for the company and you.*



### The Wrong Way

It's the end of the quarter, and you're going to miss your sales target. If you don't do something, your boss will be upset, and you might not get an upcoming promotion. Can you move a next-quarter sale to this quarter to meet your target?

*No. While you may face pressure to meet your targets, falsifying records or moving sales to an improper quarter is not allowed. Transactions must be recorded at the time they occur. Not doing so is the same as falsifying records and could have serious consequences for the company and you.*



Review our **Record Management Program, Lear Accounting Practices (LEAP) Manual, and Sarbanes-Oxley home page.**



# Competition and Antitrust



We win business fairly and seek a competitive advantage through superior performance.

## HOW WE GET RESULTS THE RIGHT WAY

Think of your favorite athletes. Competition drives them to win. In all sports, there are rules and referees to make sure competition is fair. The best teams win based on superior performance. Those who cheat or seek an unfair advantage are ultimately ejected from the game.

Like all sports, countries have rules—known as antitrust or fair competition laws—to ensure fair and honest competition in the marketplace. These laws are complex, and violations can result in severe penalties. At Lear, we seek competitive advantages through superior performance, never through unethical or illegal practices.

### *We win business fairly by:*

- Presenting our products and services honestly and accurately
- Never agreeing to or engaging in price fixing, bid-rigging, group boycotts, or territory or customer allocations
- Respecting our competitors' propriety information, especially when interacting with current and past employees of other companies



## What does Unfair Competition Look Like?

Unfair competition usually involves agreements with competitors to restrain competition. Whether formal or informal, written or verbal—they are illegal. These agreements can take many forms, such as an agreement among competitors to:

- Raise, lower, or maintain salaries of employees
- Set or change the pricing of a certain part
- Limit or restrict the production of a certain part
- Divide customers amongst themselves
- Not hire or solicit each other's employees
- Collaborate or coordinate on the bidding process for a customer program

## OUR CODE IN ACTION



### The Right Way

At a tradeshow, you get into a conversation with a supply chain professional from another company. She starts talking about a customer's terms and conditions and wonders what might happen if all suppliers rejected them. The conversation makes you uncomfortable, so you make an excuse to leave.

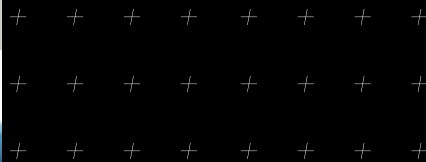
*Good move. This could be interpreted as an attempt to fix contract terms. In conversations with competitors, don't talk about business—which includes pricing, territory, employee hiring, wages, contract terms, etc. If pricing, marketing, production, products, sales, or other confidential subjects come up, orally state that you cannot discuss these subjects, end the conversation, and walk away. Whether this comes up in a conversation or an email, immediately contact the Legal Department for guidance.*



### Which Way?

We just hired someone who used to work for a competitor. The team is anxious to learn how a product feature they have but we don't was designed. Because he works for us now, can we ask him to share that information?

*No. Inducing disclosures from past employees of other companies is not fair. Even if the employee offers the information, we cannot receive it or use it for our advantage. Ask the Legal Department for advice.*



### The Wrong Way

You meet a competitor at a conference and discuss how hiring one another's employees is hurting both of you. You reach an informal agreement to not solicit or hire each other's employees. Since neither one of you put anything in writing, this is okay, right?

*No! Antitrust laws apply to more than just price fixing. They apply to any agreement among competitors that restrains competition, including competition for talent. In the competition for talent, be aware that the meaning of "competitor" includes more than just those companies that compete with Lear for the sale of its parts and components. Instead, when hiring employees is the issue, any company that could compete with Lear for the talents of a potential employee should be considered a competitor. These agreements can result in criminal penalties as well as civil penalties and fines. "Agreeing" includes stated or implied, formal, or informal, and oral or written understandings. You must share your discussion with the Legal Department immediately.*





# International Trade



As a global company, we comply with all international trade regulations.

## HOW WE GET RESULTS THE RIGHT WAY

Lear conducts business around the world, importing and exporting goods to and from numerous countries. All countries control trade with their own laws and regulations. Some prohibit trade with certain people or countries. Others restrict trading sensitive equipment or data. All require accurate customs documentation. Although navigating these legal issues is complex, when we comply with these laws, we avoid fines, penalties, and loss of permits.

### *We comply with international trade regulations by:*

- Creating and maintaining accurate and complete customs documentation
- Classifying and valuing imported and exported items correctly
- Marking imported products with the correct country of origin
- Reviewing our products, technology, software, hardware, or services to determine the proper export classifications and what items may require authorization
- Obtaining all required licenses before exporting
- Knowing the third parties with whom we do business and checking whether they are subject to restrictions

### **What is an Export?**

Physical products can be exported, but so can software, data, and technology. Exporting can occur when accessing shared drives, visiting Lear facilities, or communicating with a foreign individual by phone, email, or in person.

### **What are Sanctions?**

Some countries and regions—including the United States and the European Union—prohibit transactions with “sanctioned” individuals, entities, organizations, or countries. If you are aware of Lear products being exported to one of these sanctioned parties or if you think a customer may be exporting or plans to export Lear products to a sanctioned country, notify the Legal Department or Ethics & Compliance immediately.

### **Who must be screened for Sanctions or other Trade Restrictions?**

Before engaging in international transactions, Lear representatives should contact Ethics & Compliance for guidance on sanctions or other trade restrictions. Certain types of third parties present a higher risk and must be screened for sanctions. Ethics & Compliance can assist in determining what, if any, screening is required.



Lear's  
**Global Customs  
and Trade team**  
is always available to  
answer any questions.  
You can also consult  
our Legal Department.

## OUR CODE IN ACTION



### The Right Way

As part of the customer quoting package, you see that the vehicles incorporating our product will be exported to several countries, including some that have recently been in the news for possible sanction by the United States. You decide to raise this issue with the Legal Department.

*Good call. We all must do our part. It is better to deal with these issues before submitting the quote.*



### Which Way?

*You have a new customer, and you ask them where the vehicles will be exported. They don't answer. Because you have no knowledge of exports to a sanctioned country, this should be OK, right?*

*Maybe. If a customer declines or ignores your requests regarding the destination of their products, this is a red flag. Lear must know the destination of the vehicle to ensure that we comply with all applicable sanctions or other restrictions. Ask the Legal Department for advice.*



### The Wrong Way

*You don't have the right permit to import a certain part, but it should be obtained any day now. Since this is a new requirement, it shouldn't be an issue to change the part number to something that does not require a permit... just this once.*

*Don't do it. At Lear, we comply with all customs policies, international trade laws and regulations. Accurate documentation is always required. Contact our Global Customs and Trade team for help.*



# Insider Trading



We protect non-public material information and follow fair stock trading practices.

## HOW WE GET RESULTS THE RIGHT WAY

People buy and sell stock based on whether they think a company will perform better in the future. As an employee, you know information about the company that others don't. Using information that investors would like to know in trading stock—often called “material information”—or passing that information to others, is called insider trading, and is illegal.

For Lear's directors, officers, and certain other designated individuals this "Insider Trading" Section of the Code is supplemented by the Insider Trading Policy of Lear Corporation. Additionally, any employee who is considering adopting a plan that complies with Rule 10b5-1 under the Securities Exchange Act of 1934 should also consult the [Insider Trading Policy](#) of Lear Corporation for the applicable requirements.

### *We avoid insider trading by:*

- Never directly or indirectly sharing material non-public information with anyone, including family or friends
- Never buying or selling stock while possessing material non-public information
- Avoiding even the appearance of insider trading, including not trading Lear stock whenever company policy prohibits you from trading, such as if you are subject to a blackout period
- Asking the Legal Department for advice if you are permitted to buy or sell stock



## What is Material Information?

Material non-public information is any information related to Lear—positive or negative—which an investor may find important, would impact the stock price, and is not otherwise publicly available. Here are some examples of the types of information that until publicly announced by Lear, could constitute material non-public information:

- Earnings estimates, sales outlooks, planned dividend payments, or liquidity issues
- Plans for new plants or plant closures
- Significant financial gains or losses, or projections of significant financial gains or losses
- Potential acquisitions, mergers, or divestitures
- New product innovations, unannounced program awards or losses, or business opportunities
- Government investigations or threatened lawsuits
- Organizational changes or changes in executive leadership
- Changes to customer or Lear production schedules

## OUR CODE IN ACTION



### The Right Way

You plan to sell some of your Lear stock to pay for a big purchase. You have been working on a large acquisition that the company has been working hard to keep confidential. Even though you have not received a blackout notice, you think this could look bad because of what you know about the transaction. Before directing the trade, you check with the Legal Department to make sure there isn't a problem.

*Good call. Even though your planned sale of Lear stock has nothing to do with the acquisition, your involvement in the acquisition could give the appearance of insider trading. Even if you haven't received a notice that you may not buy or sell Lear stock (a blackout notice), if you have knowledge of material non-public information like a major acquisition, it's a good idea to check with the Legal Department before making the trade.*



### Which Way?

You are aware of a deal that Lear will be announcing soon. You mention it to a friend in passing. Even though you told her not to tell anyone, she buys stock based on this information. Since you didn't benefit from passing on the information, it shouldn't be a problem, right?

*The rules on material non-public information make it illegal to both buy or sell the stock, or for you to provide information to someone else. By passing on the information, this situation is a violation of federal U.S. securities laws and Lear's Code. Both you and your friend could be charged with insider trading. In addition, you could face disciplinary action at work, including dismissal. You should go to the Legal Department immediately for advice any time you are uncertain about using sensitive Lear information for any purpose other than in connection with your job.*



### The Wrong Way

One of your best friends owns a significant amount of Lear stock. You've heard that a customer may be canceling a major program that could impact Lear's financial position. As a result, your friend could lose money. If you mention to him that it could be a good idea to sell his shares—if you don't give the reason—it should be fine, right?

*No. Giving anyone a tip when you have knowledge of material non-public information is insider trading. Never give stock recommendations regarding Lear or any company Lear does business with when you have material non-public information about Lear or the other company with which it does business.*





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# Working in the Industry & Community

# Working with Suppliers



We carefully select our suppliers and develop long-term collaborative relationships for our mutual success.

## HOW WE GET RESULTS THE RIGHT WAY

One of Lear's core competencies is managing our complex global supply chain. We rely on thousands of suppliers to conduct Lear's business. We continuously evaluate supplier quality, delivery, and price, as well as supplier compliance, governance, human rights, and business practices. We also partner with organizations to support supplier diversity initiatives. No potential supplier is precluded from consideration based on race, color, religion, sex, age, national origin, or any other protected class.

*We carefully select the best suppliers by:*

- Executing our audit processes, including on-site reviews when and where practicable
- Ensuring that all suppliers comply with applicable U.S. sanctions and global anti-bribery and anti-corruption laws
- Requiring our suppliers to meet the standards in our **Global Requirements Manual and Code of Conduct for Suppliers** and our **Supplier Sustainability Policy**
- Screening high-risk suppliers by using the **E&C Disclosure Management System**

### Who Might Be a High-Risk Supplier?

Determining who might be a high-risk supplier requires a review of several factors, including the location of the supplier, the type of business, and current global events. Guidance on potentially high-risk suppliers is available from Ethics & Compliance. This guidance is updated as global risks develop or change.







Read our **Global Requirements Manual and Code of Conduct for Suppliers** and our **Supplier Sustainability Policy**.

## OUR CODE IN ACTION



### The Right Way

A new supplier has submitted an extraordinarily low quote and you also notice they are headquartered in a sanctioned country. With very few suppliers available and short timelines, your manager hints that you skip the screening requirement and approve the supplier. However, you know that doing business with a supplier that violates U.S. sanctions could have serious implications for Lear. You submit the supplier information to the **E&C Disclosure Management System**.

*Good call. Doing business with a company that is on a sanctions list could cause Lear to be in violation of U.S. sanctions. It's better to perform due diligence before making a supplier agreement than finding out about compliance issues later.*



### Which Way?

*You notice that two of the three quotes you've received from suppliers for a new program are nearly identical, including the mailing addresses of the two suppliers. Both quotes would represent significant savings for Lear. Since you have followed the policy requiring at least three quotes, it should be OK to award business to one of them, right?*

*Probably not. While this would technically comply with Lear policy, it does seem as though the quotes were submitted by the same entity or if there are two entities, that they coordinated their bids. Talk with your manager about the issue and report your findings to Ethics & Compliance.*



### The Wrong Way

A government official recommends a supplier and suggests you add them to your upcoming bidding opportunity. The government official isn't insisting that you select their recommended supplier, so that shouldn't be a problem, right?

*No. When a government official is involved in a business transaction, you need to contact the Legal Department or Ethics & Compliance. Before considering this supplier, Lear must conduct a due diligence process and assure that including the recommended supplier won't appear to be inappropriate or violate any anti-bribery or anti-corruption laws.*

# Social Media



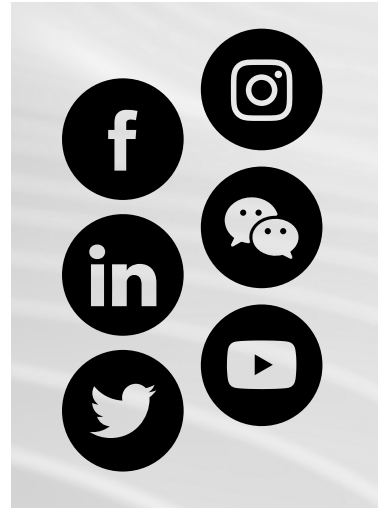
We are responsible for our social media posts and comments, and mindful of their impact.

## HOW WE GET RESULTS THE RIGHT WAY

Social media can inspire and inform. However, without careful consideration, posts may be inappropriate or violate Lear's policies regarding harassment or discrimination. It's important to be respectful while posting and commenting on social media.

*We protect the company's reputation on social media by:*

- Never posting in the company's name, unless approved by Corporate Communications
- Identifying opinions as our own
- Never sharing any of Lear's or our customers' confidential information or trade secrets, including pictures of prototypes, internal reports, or product designs or any pictures of our production equipment
- Never making harassing or discriminatory statements or threats of violence, or any other statement that violates our Harassment Free Workplace Policy, Workplace Violence and Weapons Policy, or Equal Employment Opportunity Policy





## OUR CODE IN ACTION



### The Right Way

Corporate Communications posts an announcement that Lear received a quality award for one of our products. Proud of your involvement on the product team, you decide to post a link to the announcement on your personal social media.

*Great! You are not sharing any confidential information because Corporate Communications has publicly announced the award. Lear encourages employees to share positive stories that the company has publicly disclosed.*



### Which Way?

You are excited to tell the world about our new product and plan to post a very simple one-sentence message on social media. That should be OK, right?

*Maybe. Has the company already published a press release or introduced the product publicly? Your post could interfere with a well-planned marketing strategy or release information that is not yet public. Get approval from Corporate Communications first.*




### The Wrong Way

At work, you get into a dispute with a co-worker who is slowing down production. After work, you post some disparaging remarks about your co-worker on a social media site. Your co-worker responds by insulting you. Other employees join in. Eventually, things escalate, and you threaten to take care of the co-worker tomorrow at work. The next day, an employee shares all the posts with Human Resources. Since you made your comments after work, you don't think you should get into trouble.

*Wrong. If you post derogatory comments about a co-worker's protected status, such as the co-worker's race, age, sex, or threaten violence, you have violated Lear's policies—even if you post your comments outside of work. Regardless of where or when they are posted, those types of comments can create a hostile work environment for your co-workers, making them feel unsafe at work. The best way to resolve workplace issues is to talk to your supervisor or co-workers directly. Never post anything that could reasonably be viewed as malicious, obscene, threatening, or intimidating, or might constitute harassment or bullying under our **Harassment Free Workplace Policy** or **Workplace Violence and Weapons Policy**.*



Lear Corporation   
@LearCorporation


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About

Photos



Lear Corporation 

Yesterday at 6:33 AM · 

Exciting news! 🎉 Lear was named a 2022 Workforce Diversity Magazine. We understand that to advance mobility, we need to advance #STEM culture where employees are seen, heard. <https://bit.ly/3JEcOHS> #WinningTheFuture



Read more in our **Social Media Policy**.

# Sustainability



Every day, we strive for better.

## HOW WE GET RESULTS THE RIGHT WAY

Our employees support our goals to reduce our environmental impact, enhance our local communities, and increase the sustainability of our company. As a signatory participant in the United Nations (UN) Global Compact, our environmental stewardship, social responsibility, and governance (ESG) efforts are guided by the UN's 17 Sustainable Development Goals. We are also Making every drive better™ by focusing on cleaner, safer, smarter, and more comfortable mobility.

*We support Lear's ESG efforts by:*

<div></div> <div>Environment</div>	<ul style="list-style-type: none"><li>• Supporting environmental programs in our communities</li><li>• Developing green technologies, using sustainable sourcing, and operating our plants efficiently and responsibly</li><li>• Identifying opportunities to design products that weigh less, reduce mass, are recyclable, and use bio-based, recycled, and renewable content</li></ul>
<div></div> <div>Social</div>	<ul style="list-style-type: none"><li>• Fostering collaboration, interaction, tolerance, and respect at work</li><li>• Requiring all suppliers and subcontractors to uphold the same labor standards we do</li></ul>
<div></div> <div>Governance</div>	<ul style="list-style-type: none"><li>• Establishing sustainability processes within our operations and product strategies</li><li>• Ensuring the raw materials used in our products do not directly or indirectly contribute to funding conflicts, human rights abuses, or the unethical treatment of animals</li><li>• Requiring employees and suppliers to implement industry-leading policies and practices for the ethical treatment of animals, including the Five Freedoms of Animals</li></ul>







Learn more about  
**Lear Sustainability.**



Our **EHS Policy** focuses on preventing pollution, providing a safe work environment, protecting natural resources and complying with government regulations.



Our **Quality Policy** highlights our commitment to establish the highest industry standards for quality, value, service, and technology.



Our **Human Rights Policy** is guided by the United Nations Global Compact, its Ten Principles and Sustainable Development Goals, as well as the 1998 Declaration on Fundamental Principles and Rights at Work.



Our **Supplier Sustainability Policy** applies to any third party that provides goods or services to Lear as well as their subcontractors.



Our **Responsible Materials Sourcing Policy** requires employees and suppliers to adopt best practices in production processes, materials and component sourcing, as well as addressing environmental, social and product safety issues.



Our **No Deforestation Policy** reinforces responsible sourcing, promotes supply chain transparency, conserves natural resources, prohibits clear cutting, and ensures the materials we purchase are not acquired from illegally deforested areas or protected lands.

## OUR CODE IN ACTION



### The Right Way

While working on a new design for a customer, you discover a bio-based alternative that could reduce the carbon footprint of the product with no additional cost. You bring your suggestion to your supervisor.

*Good job. Lear is always working to find ways to innovate and make its products environmentally friendly.*



### Which Way?

You notice that your assembly line creates scrap material that could be reused. You have a general idea about how to reuse the material but nothing specific. Should you tell your supervisor?

*Absolutely! We are always looking for ways to recycle, reuse and prevent waste throughout our facilities.*



### The Wrong Way

You notice an environmental report lists the same reading day after day. Knowing that getting the same reading several days in a row is highly unlikely, you are suspicious about how the information is being recorded or measured. Then again, you don't want to get anyone into trouble. It really isn't your job, so you stay quiet.

*That isn't how we work at Lear. If you see something suspicious, say something to your supervisor or use the **Helpline**. Whether it's an honest mistake, a procedural oversight or an equipment error, an inaccurate environmental report is not consistent with how we do business and could result in fines or even more serious consequences.*



# Charitable Donations



We care about and support the communities where we operate and do business.

## HOW WE GET RESULTS THE RIGHT WAY

Lear supports charities dedicated to economic well-being, education, and environmental stewardship. We are proud of our long history of community involvement. Our Giving Committees ensure all charitable donations are aligned with Lear's goals, and our employees dedicate themselves to a wide range of charitable and service organizations in our global communities.

### *We support our local communities by:*

- Choosing charities that reflect our values
- Obtaining permission to use the company's name or resources to support a charity through regional Giving Committees (regional Giving Committee contacts are listed in the **Charitable Donations Policy**)
- Never spending Lear funds on political contributions, requesting political support from a supplier, or using our company's name or resources (including assets, services, or facilities) to promote a political party or candidate





## OUR CODE IN ACTION



### The Right Way

As a board member of a local charity, you are asked to request donations from our suppliers. You explain that you cannot ask Lear suppliers to contribute to the charity because it might appear inappropriate. Right move?

*Absolutely! Asking a supplier to donate to a charity where you are a board member could create a conflict of interest. Using your position to influence a supplier would violate Lear policy.*



### Which Way?

You want Lear to donate to a non-profit where you volunteer. Located near a Lear facility, the charity provides training to help people re-enter the workforce. Will Lear support this charity?

*Maybe. All charitable donation requests must be submitted to your regional Giving Committee for approval. The company entrusts regional Giving Committees with ensuring the charity's mission and values align with those of Lear.*



### The Wrong Way

You volunteered to support a candidate by putting together campaign materials. The company cafeteria has the space you need and is empty after lunch time. Since the campaign is providing all the materials, it would be OK to have volunteers use the room, right?

*No. While the company respects every employee's right to be involved in the political process, we don't take sides. Using any company resource—including building space—is not allowed because it implies company support for a specific candidate. Prohibited political contributions also include donating your time during work hours to a political campaign or cause. If you want to volunteer your time during working hours for a political candidate, you must use a vacation day.*



Refer to our  
**Charitable  
Donations  
Policy.**



# My Pledge

## 53 My Pledge

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# My Pledge



**I pledge to Get Results the Right Way.**

Thank you for taking the time to learn about our Code of Business Conduct & Ethics. If you have questions about the policies or laws that apply to your activities, contact your supervisor, your local Human Resources representative, the Legal Department, or Ethics & Compliance.

**Our Code of Business Conduct & Ethics represents a commitment to doing what is right.**

***When I represent Lear, I agree to:***

- Uphold Lear's commitment to Get Results the Right Way
- Understand and follow the Code of Business Conduct & Ethics, other Lear policies, and applicable laws
- Speak up when I see or suspect a violation of the Code of Business Conduct & Ethics, other Lear policies, or applicable laws
- Complete all Ethics & Compliance training courses
- Cooperate with Ethics & Compliance investigations

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

*Please provide this signed page to your Human Resources representative.*

Effective November 1, 2022  
Revised November 17, 2023